

**ORAL ARGUMENT
REQUESTED**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re: LONGWEI PETROLEUM INVESTMENT
HOLDING LIMITED SECURITIES LITIGATION

1:13-cv-00214 (HB)

ECF CASE

CLASS ACTION

This Document Relates To: ALL ACTIONS

**NOTICE OF DEFENDANT DOUGLAS COLE'S
MOTION TO DISMISS**

PLEASE TAKE NOTICE that on a date and time as may be set by the Court, Defendant Douglas Cole ("Mr. Cole") will respectfully move this Court for an Order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure: (i) dismissing with prejudice Plaintiffs' Consolidated Securities Class Action Complaint dated July 8, 2013, insofar as it purports to assert claims against Mr. Cole; and (ii) granting such other and further relief as the Court may deem just and proper.

This motion is based on the accompanying Memorandum of Law in Support of Defendant Douglas Cole's Motion to Dismiss Consolidated Securities Class Action Complaint, the pleadings and other filings herein, and such other written and oral argument as may be permitted by the Court.

Dated: November 1, 2013
Coral Gables, Florida

Respectfully submitted,

/s/ Mark David Hunter
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CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2013, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record listed below via transmission of Notices of Electronic Filing generated by CM/ECF.

Service List

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/s/ Mark David Hunter
Mark David Hunter